

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re: BLOCKFI INC., et al., Debtors.

Case No.: 22-19361 (MBK) Chapter 11

MOTION TO RECONSIDER AND REVISE VOTING STATUS

**FILED**  
**JEANNE A. NAUGHTON, CLERK**

**DEC 27 2024**

**U.S. BANKRUPTCY COURT**  
**TRENTON, NJ**  
BY *[Signature]* **DEPUTY**

TO THE HONORABLE JUDGE OF THE UNITED STATES BANKRUPTCY COURT:

COMES NOW, Yan Tkach, a creditor in the above-referenced bankruptcy proceeding, and respectfully files this Motion to Reconsider and Revise Voting Status in the Class Action associated with the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code, and in support thereof, states as follows:

**I. BACKGROUND**

1. I, Yan Tkach, am a creditor in this bankruptcy case and held an account with BlockFi Inc. worth approximately \$127,000 at the time of the bankruptcy filing. This account included investments made by both myself and my mother.
2. Due to inadvertence and confusion during the voting process for the class action in the bankruptcy proceedings, I failed to cast my vote correctly.
3. On March 14, 2024, I emailed the court seeking guidance on rectifying this error. The court instructed me to file a motion to address the issue. Since I do not have the capital to hire an attorney and other attorneys have not been significantly helpful, there has been a learning curve in figuring out how to properly submit this motion.

**II. RELIEF REQUESTED** 4. I respectfully request the Court to reconsider and allow the revision of my voting status in the class action associated with the BlockFi bankruptcy proceedings. 5. I have made good faith efforts to correct my error promptly upon realizing the mistake. 6. Allowing this correction will prevent substantial prejudice, as the potential recovery in the class action is significant given the value of my account and current cryptocurrency market conditions.

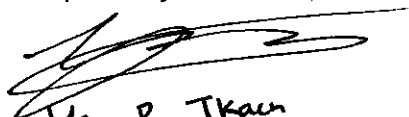
**III. LEGAL BASIS** 7. Under Rule 9024 of the Federal Rules of Bankruptcy Procedure, incorporating Rule 60(b) of the Federal Rules of Civil Procedure, this Court has discretion to grant relief based on mistake, inadvertence, or other justifiable grounds. 8. Denying this motion would result in undue hardship and inequity, given my proactive efforts to correct the mistake and the substantial financial impact of exclusion from the class action.

**IV. PRAYER FOR RELIEF** WHEREFORE, I respectfully request that this Court:

1. Grant this Motion to Reconsider and allow me to revise my voting status in the BlockFi bankruptcy class action.
2. Provide such other and further relief as the Court deems just and equitable.

Dated: December 24, 2024

Respectfully submitted,

  
Yan R. Tkach  
6008 Kauttman Ave. Temple City, CA 91780  
email: Yantkach1@gmail.com

## **Certificate of Service**

### **UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY**

In re:  
BLOCKFI INC., et al.,  
Debtors.

Case No.: 22-19361 (MBK)  
Chapter 11

### **CERTIFICATE OF SERVICE**

I, Yan Tkach, hereby certify that on **December 24, 2024**, I served a true and correct copy of the **Motion to Reconsider and Revise Voting Status in the Class Action by Certified Mail with Return Receipt Requested** upon the following parties:

1. **Debtors' Counsel:**  
Haynes and Boone, LLP  
30 Rockefeller Plaza, 26th Floor  
New York, NY 10112  
Attn: Richard S. Kanowitz
2. **United States Trustee:**  
Office of the U.S. Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

I certify under penalty of perjury that the foregoing is true and correct.

Dated: **December 24, 2024**  
Temple City, California

Yan Tkach



YantKach7@gmail.com